

EXHIBIT MM

Deposition of 30(b)(6) Gabriel Portugal

Reyes, et al. v. Chilton, et. al.

May 17, 2023



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1 no-no.

2 BY MS. O'SULLIVAN:

3 Q. Does LULAC national believe that the signature
4 verification process assists counties in ensuring that
5 people don't vote twice?

6 MR. MORFIN: Objection to the form of the
7 question.

8 THE WITNESS: I have no idea how they use
9 this process so I cannot make a statement related to
10 that.

11 MS. O'SULLIVAN: We can take a quick break
12 if that works for everyone.

13 (Break taken from 1:51 p.m. to
14 2:10 p.m.)

15 EXAMINATION (CONTINUED)

16 BY MS. O'SULLIVAN:

17 Q. Back on the record.

18 Mr. Portugal, has LULAC national ever engaged in
19 discussions with the Benton County auditor's office?

20 MR. MORFIN: Objection to the form of the
21 question.

22 THE WITNESS: I don't think so, no.

23 BY MS. O'SULLIVAN:

24 Q. Has LULAC national ever engaged in discussions
25 with the Benton County commissioners?

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1 MR. MORFIN: Objection to the form of the
2 question.

3 THE WITNESS: No.

4 BY MS. O'SULLIVAN:

5 Q. And has LULAC national ever engaged in
6 discussions with the Benton County canvassing review
7 board?

8 MR. MORFIN: Objection to the form of the
9 question.

10 THE WITNESS: No.

11 BY MS. O'SULLIVAN:

12 Q. Has LULAC national ever engaged in discussions
13 with the Chelan County auditor's office?

14 MR. MORFIN: Objection to the form of the
15 question.

16 THE WITNESS: No.

17 BY MS. O'SULLIVAN:

18 Q. Has LULAC ever engaged in discussions with the
19 Chelan County county commissioners?

20 MR. MORFIN: Objection to the form of the
21 question.

22 THE WITNESS: No.

23 BY MS. O'SULLIVAN:

24 Q. Has LULAC national ever engaged in discussions
25 with the Chelan canvassing review board?

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1 MR. MORFIN: Objection to the form of the
2 question.

3 THE WITNESS: No.

4 BY MS. O'SULLIVAN:

5 Q. Has LULAC national ever engaged with the Yakima
6 County auditor's office?

7 MR. MORFIN: Objection to the form of the
8 question.

9 THE WITNESS: No.

10 BY MS. O'SULLIVAN:

11 Q. Has LULAC ever engaged in discussions with the
12 Yakima County commissioners?

13 MR. MORFIN: Objection to the form of the
14 question.

15 THE WITNESS: No.

16 BY MS. O'SULLIVAN:

17 Q. Has LULAC ever engaged in discussions with the
18 Yakima County canvassing review board?

19 MR. MORFIN: Objection to the form of the
20 question.

21 THE WITNESS: No.

22 BY MS. O'SULLIVAN:

23 Q. Other than the filing of the present complaint,
24 has LULAC national ever raised the issues regarding the
25 ballot signature rejection rates with the Benton County

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1 auditor's office?

2 MR. MORFIN: Objection to the form of the
3 question.

4 THE WITNESS: No.

5 BY MS. O'SULLIVAN:

6 Q. Has LULAC national ever raised the issues about
7 ballot issues or rejection rates with the Yakima County
8 auditor's office?9 MR. MORFIN: Objection to the form of the
10 question.

11 THE WITNESS: No.

12 BY MS. O'SULLIVAN:

13 Q. Has LULAC national ever raised the issues
14 regarding ballot signature rejection rates with the
15 Chelan County auditor's office?16 MR. MORFIN: Objection to the form of the
17 question.

18 THE WITNESS: No.

19 BY MS. O'SULLIVAN:

20 Q. With Chelan County commissioners?

21 MR. MORFIN: Objection to the form of the
22 question.

23 THE WITNESS: No.

24 BY MS. O'SULLIVAN:

25 Q. With Chelan canvassing review board?

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1 MR. MORFIN: Objection to the form of the
2 question.

3 THE WITNESS: No.

4 BY MS. O'SULLIVAN:

5 Q. With Benton County commissioners?

6 MR. MORFIN: Objection to the form of the
7 question.

8 THE WITNESS: No.

9 BY MS. O'SULLIVAN:

10 Q. With Benton County canvassing review board?

11 MR. MORFIN: Objection to the form of the
12 question.

13 THE WITNESS: No.

14 BY MS. O'SULLIVAN:

15 Q. With the Yakima County commissioners?

16 MR. MORFIN: Objection to the form of the
17 question.

18 THE WITNESS: No.

19 BY MS. O'SULLIVAN:

20 Q. Has LULAC national ever raised the issue
21 regarding ballot signature rejection rates with Yakima
22 County canvassing review board?

23 MR. MORFIN: Objection to the form of the
24 question.

25 THE WITNESS: No.

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1 BY MS. O'SULLIVAN:

2 Q. What's LULAC national's understanding of the
3 Washington ballot cure process?4 MR. MORFIN: Objection to the form of the
5 question.6 THE WITNESS: We understand there is a
7 process that, you know, like the whole state follows,
8 different counties.

9 BY MS. O'SULLIVAN:

10 Q. So does LULAC national understand that once a
11 voter's ballot declaration signature has been flagged
12 for signature mismatch following a multilevel review
13 process what steps a voter must take to cure their
14 ballot?15 MR. MORFIN: Objection to the form of the
16 question.17 THE WITNESS: We don't have a special
18 process for delineating how to curate a ballot, I don't
19 know if that's what you are asking, but each county has
20 their own process and their own timelines as far as when
21 ballots are rejected and the notices go out.

22 BY MS. O'SULLIVAN:

23 Q. And is LULAC national familiar with those
24 individual counties's timelines and requirements for the
25 ballot cure process?

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C E R T I F I C A T E

2 STATE OF WASHINGTON)
3) ss.
COUNTY OF KING)

I, KIM M. DORE-HACKBARTH, a Certified Shorthand
Reporter in and for the State of Washington, do hereby
certify that the foregoing transcript is true and
accurate to the best of my knowledge, skill and ability.

9 Reading and signing was requested pursuant to
10 FRCP Rule 30(e).

11 IN WITNESS WHEREOF, I have hereunto set my hand
12 and seal this 25th day of May, 2023.

KIM M. DORE-HACKBARTH, RPR, CCR
Certified Court Reporter No. 2072
(Certification expires 5/27/23.)